



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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September 29, 2008

Reply To: EPTA – 088

99-099-FHW

Mr. Bryan Dillon
Federal Highway Administration
Washington Division
711 South Capitol Way, Suite 501
Olympia, WA 98501

Mr. Jason W. Smith, Environmental Manager
I-90 Snoqualmie Pass East Project
Washington State Dept. of Transportation
South Central Region
P.O. Box 12560
Yakima, WA 98909-2560

Dear Mr. Dillon and Mr. Smith:

The U.S. Environmental Protection Agency (EPA) has reviewed the **I-90 Snoqualmie Pass East** Final Environmental Impact Statement (FEIS). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We commend FHWA and WSDOT for the proposal and development of an exceptional project – exceptional in process as well as outcome. The collaborative approach, which used multi-agency Interdisciplinary and Mitigation Development Teams (IDT and MDT), and the Technical Subcommittees for Stormwater, Wetlands, and Wildlife Monitoring, was a fruitful innovation for shaping the project. We appreciate the high quality, ongoing communication with resource agencies, and the extra outreach efforts to the public, non-governmental organizations, and tribes.

In terms of outcome, we think the proposed project will result in a first class transportation facility that is sensitive to context and effective in design. To meet the project need for ecological connectivity, the FEIS presents a Preferred Alternative that is designed to maximize the environmental benefits at each Connectivity Emphasis Area (CEA) and provides additional small animal passage and hydrological connectivity features between CEAs. The environmental benefits include improving fish passage, habitat connectivity, increasing aquatic habitat, restoring in-stream physical processes, improving water quality and groundwater flow.

The FEIS is a high quality document. Its presentation is clear, pleasant, reader-friendly, and complete yet not encyclopedic. All in all, the I-90 Snoqualmie Pass East project sets an example to be followed nationwide. We appreciate all of the dedicated efforts to bring it forward.

As the project moves forward, we have suggestions and recommendations that we offer for your consideration:

Wetlands. We appreciate all the past and continuing efforts to avoid and minimize impacts to aquatic resources, particularly avoidance of impacts to high value wetlands. Acquisition and preservation of the 265 acres in the Gold Creek Valley as partial mitigation for wetland impacts is another great accomplishment that will augment the efforts to provide ecological connectivity. We intend to continue working with WSDOT during the Section 404 permitting process, and will be happy to provide further comment regarding the specifics of the wetland mitigation plan as needed.

Air quality. The response to comments on the Draft EIS indicates that emission controls during construction will be developed during project permitting, and that emission controls beyond those required by Ecology or NAAQS would require state-wide policy-level decisions and could increase bid prices for construction.

Recommendation: There are several inexpensive and easy to implement construction mitigation measures that would mitigate air toxics and diesel particulates. We would be happy to provide updated lists of construction mitigation measures for consideration.

Cumulative effects. We appreciate the discussion of trends in Exhibit 3-64 and 3-65 that are part of the “reasonably foreseeable future actions” in the project area, even though no specific project proposals have been made. One of the identified trends is that private land will continue to develop. However, the discussion in the FEIS assumes that zoning designations will remain unchanged from the current comprehensive land use plan.

Recommendation: The application of trends could also be applied to the projections for Kittitas County land use. For example, rather than assuming, as on page 3-213 of the FEIS, that future private land use development will be consistent with current zoning, it could be helpful to examine the trends in development patterns in Kittitas County with respect to zoning changes, annexations, growth area expansions, etc. to determine whether this assumption is reasonably foreseeable.

We commend you for including a discussion of efforts to control greenhouse gas emissions at the state and project levels. We support and encourage these efforts in all aspects of project development.

Noise. The FEIS indicates (p. 3-134, 3-135) that noise mitigation was found to be reasonable and feasible for the Lake Easton State Park, but there was no mention of the findings for the Crystal Springs Campground.

Recommendation: Consider discussing in the Record of Decision (ROD) and with the Forest Service what the noise impacts would be for the Crystal Springs Campground, and whether or not mitigation could be provided, such as potential relocation to provide natural setting and quietude.

Thank you for the opportunity to participate in this excellent NEPA process. If you would like to discuss these comments in further detail, please feel free to contact me at (206) 553-1601, or Elaine Somers of my staff at (206) 553-2966.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit